

Questions from our consultation

This form sets out the questions we ask in a consultation on restoring and expanding open habitats from woods and forests in England that we launched on 12 March 2009. The consultation ends on 5 June 2009. You can find the consultation at www.forestry.gov.uk/england-openhabitats-consultation or contact Dominic Driver, Forestry Commission for further information (contact details below).

Comments on any aspect of the consultation are welcome, but we are particularly interested in your responses to the questions below. This form is available at www.forestry.gov.uk/england-openhabitats-consultation.

Your name:	Sian Atkinson
Your organisation (if any):	The Woodland Trust
Date:	4 June 2009

The Woodland Trust welcomes the opportunity to respond to this consultation. The Trust is the UK's leading woodland conservation charity. We have four main aims: no further loss of ancient woodland, restoring and improving woodland biodiversity, increasing new native woodland and increasing people's understanding and enjoyment of woodland. We own over 1,000 sites across the UK, covering around 20,000 hectares (50,000 acres) and we have 300,000 members and supporters.

General overarching comments:

1. The Woodland Trust believes that all previously open-ground semi-natural habitats planted with non-native conifers should be restored, where sufficient remnants survive of the original habitat and where long-term management is sustainable. This is the most effective way to achieve targets for restoration/creation of such open ground habitats within the UK Biodiversity Action Plan, and is a key part of a range of actions required to enable wildlife, and people, to adapt to climate change.

2. UK BAP targets: the case for woodland expansion

We are very concerned that the consultation pitches restoration of semi-natural open ground habitats, an important measure for biodiversity enshrined in the UK BAP, against the need to maintain net forest cover. We believe this is unhelpful and likely to cause confusion and even prejudice in the minds of the general public over an already complex issue.

It is a mistake to conflate these issues. The need to restore afforested semi-natural open ground habitats results from forestry policy from the middle of the last century, now recognised as misdirected, when trees were planted in the wrong place, usually with significant support in the form of grants and tax relief, or by the state on Forestry Commission land. Restoration of these habitats would result in benefits for biodiversity and for people, by creating more resilient natural habitats and enabling wildlife to move more easily in the face of climate change.

This would result in some loss of tree cover. But there is currently also an urgent need to address failure to meet woodland expansion targets for England, also under the UK BAP. This identifies a target of 80,000 ha of new woodland in England by 2020, yet current planting rates are very low, around 2000 ha per annum. If the targets were met, this could result in trees and woods that would

better serve the multiple needs of society for timber, fuel, and ecosystem services, and could mean no net loss in woodland cover.

While the Trust is sympathetic to the Forestry Commission's need to adhere to international commitments on maintaining net woodland cover in England we do not believe this should occur at the expense of bold action to address the challenges we face, including the need to adapt to climate change, through restoration of other habitats.

3. Adaptation to climate change: the need for restoration

There is incontrovertible evidence that climate change is already occurring, and that we must focus on adaptation as well as mitigation. The Woodland Trust believes that wide-scale action is needed to create landscapes that are ecologically functional and will be welcoming to wildlife in a time of rapid climate change. Making natural systems more resilient will not only benefit biodiversity but will also provide 'services' that are essential to the functioning of human society, such as clean air and water, renewable natural resources, healthy soils, and flood relief. Our landscape scale principles state that action should focus on a number of areas, including:

- conserving all semi-natural habitats, not just a representative sample of sites,
- restoring all woodland and semi-natural habitats planted with non-native conifers
- buffering semi-natural habitats from the negative effects of adjacent land-use
- reducing the intensity of the intervening land-use practices between semi-natural habitats in order to increase the ability of wildlife to move across landscapes. The latter includes re-establishing more gentle transitions from one habitat to another.

The Trust therefore supports protection and maintenance of semi-natural open ground habitats at a landscape scale, and the removal of secondary woodland and plantations from important semi-natural open ground habitats at a landscape scale, where sufficient relict features survive to enable their restoration.

4. Prioritisation

The decision to restore should be made on the basis of:

- Survival of remnant features of the original semi-natural open ground habitat and the level of threat to these posed by tree cover
- The contribution of restoration to habitat connectivity. It is hoped that the Forestry Commission will, with NGOs and statutory agencies, seek to target restoration at a landscape level. Much work has already been done through the HAP, Living Landscapes and other programmes for initial target areas to be identified.
- The ability to manage the site in the long term, which may depend on scale (low intensity grazing may be more feasible on larger sites)

5. Ancient Woodland

The Trust strongly supports the Forestry Commission view that ancient woodland should not be removed or damaged in any way. Ancient woods are irreplaceable, the result of hundreds of years of continuity. The programme may also provide an opportunity for targeted restoration of Planted Ancient Woodland Sites alongside restoration of open ground habitats, as well as the opportunity to create new woodland and other habitats to protect and buffer existing and restored semi-

natural habitats, strengthening the holistic landscape-scale approach that is needed to protect all habitats.

No	Question.
The nature of the change	
1.	Does your aspiration for the scale of the policy fit within our calculated range of 5,600 to 30,000 ha of restoration or expansion of open habitats from woodland or forest over 10 to 15 years? This is 370 to 3,000 ha each year. What level of intervention would you prefer and how is this justified?
<p>No. We do not agree with the way these proposed targets have been derived. We believe that as a matter of urgency all semi-natural open ground habitats planted with non-native conifers should be restored, where sufficient remnants of the original habitat survive and their future management can be sustained. There is an urgent need to create sympathetically managed landscapes that allow as many species as possible to adapt and move in response to change. In addition, restoration from non-native conifer plantation is likely to be the most effective way to meet UKBAP targets for creation of semi-natural open ground habitats.</p> <p>There are 86,700 ha of conifer plantation on potential open habitats in England. The higher level of restoration proposed would result in less than 40 per cent of this total area being restored over the next 10 to 15 years. While figures are not available for the area capable of restoration (ie where sufficient remnants of the original habitat survive), it may be higher than this range. Timescales for restoration should be dictated by the urgency of the threat and the opportunity presented as plantation trees reach economic maturity.</p> <p>Semi-natural open ground habitats that have long regenerated to native woodland are less of a concern, but we would support restoration of grazing to ancient wood pastures where presence of species wholly dependant on the combination of old-growth and open ground survive, and restoration of grazing to new native woodland on former semi-natural open ground habitats where significant remnants survive. Prioritisation should be according to the criteria outlined in the general comments (point 4) above.</p>	
Desired outcomes	
2.	Have we developed a reasonable list of desired outcomes of the policy? Do you wish to suggest any amendments?
<p>We suggest the following amendments:</p> <ul style="list-style-type: none"> - The threats posed by direct and indirect impacts of climate change are so great that we suggest sustainable adaptation to climate change is listed as a separate outcome. The ability of ecological communities to cope with other threats should then be listed as a separate point. - Contribution to achieving targets enshrined in the UKBAP, which are also a Government commitment, should be mentioned as a desired outcome, perhaps over-arched by an outcome of improvements to biodiversity of non-woodland habitats. - We would prefer to see a specific outcome of restoration of all semi-natural open-ground habitats planted with non-native conifers, where sufficient remnants of the original habitat survive and their future management can be sustained. - We do not agree that keeping to commitments on woodland cover should be a necessary outcome as this limits restoration and is dependant on other factors outwith this policy. We do not believe meeting this commitment should occur at the expense of the action that is required to restore semi-natural open habitats, given the importance of this action to creating more ecologically functional landscapes. 	

No	Question.
Measuring the success of the policy	
3.	Have we developed a reasonable set of indicators for evaluation? Do you wish to suggest any amendments to this indicator list?
<p>Rather than developing new indicators, use should be made of existing indicators to measure the success of the policy. For example, the indicator of landscape connectivity that Forest Research are currently developing for Defra with regard to 2010 could be used.</p> <p>If rate and area of restoration is used as an indicator, it would be helpful if this separated out the rate and area of restoration for open habitats planted with non-native conifers from those for open habitats where new native woodland has established, as we would argue that restoration of the former is more important to restoring landscapes that enable the widest biodiversity to survive and evolve. This indicator also needs to take into account ongoing maintenance of the habitat once restored</p>	
Policy proposals	
Elements present in the policy	
We will treat woodland and open habitats as potentially mutually beneficial	
4.	Do you agree that woodland and open habitats are potentially mutually beneficial? Is promotion of this idea helpful in gaining support for open habitat restoration and expansion from woodland?
<p>We agree that in principle native woodland and open habitats can be mutually beneficial. We support the idea of restoration to wood-pasture, mosaics of native woodland and open habitat, and the idea of ecotones between habitats, all of which we believe would contribute to creating landscapes that are more resilient, ie able to absorb and respond to change while sustaining biodiversity and ecosystem goods and services. Historically many of these open-ground habitats would not have been completely devoid of trees. Decisions to restore need to take into account site history, current condition (including its scale, the nature of woodland cover and survival of remnant open-ground habitats, proximity to other semi-natural open-ground habitats in the surrounding landscape and ability to maintain open-ground habitats). Management of recent secondary native woodland as wood-pasture, where appropriate, could restore substantial semi-natural open-ground habitats whilst sustaining greater than the minimum canopy cover of 20 per cent required for an area to be classified as woodland. There would therefore be no loss of woodland, enabling the Forestry Commission more easily to meet its commitments on maintaining woodland cover, and to be involved in regulating restoration and future management. However, we would not agree with long-term retention of non-native plantations on semi-natural open ground habitats that are capable of restoration.</p>	
A presumption against removal of 'mature native woodland'	
5.	Do you agree with the principle that there should be a presumption against removal of ancient and 'mature native woodland'?
<p>Yes we agree with a presumption against removal of ancient woodland. The Woodland Trust's view is that ancient woodland is an irreplaceable and priceless resource; there should be no further loss of ancient woodland. We would wish to see ancient wood-pastures restored to moving mosaics of woodland, semi-woodland and open-ground habitats with open-grown long-lived trees, where there is a continuity of old trees reaching back into the past, as indicated by the presence of species most reliant on it (e.g., Lobarion-lichen communities and saproxylic invertebrates) and where it is reasonable</p>	

No	Question.
	<p>to assume their management as wood-pasture and the species that it supports can be sustained. In recent secondary native woodland (ie not situated on an ancient woodland site) the age of the trees should not dictate whether or not restoration takes place. This should be decided according to whether sufficient remnants of the semi-natural open-ground habitat remain and whether their future management can be sustained. In both ancient wood-pastures and recent secondary native woods, restoration will often demand low-intensity year-round grazing preferably by cattle. Whilst this may inevitably require a substantial reduction in canopy cover, felling of mature trees should be the minimum needed to achieve the objectives, due heed should be paid to the extent of historic woodland within the site and an absolute minimum of 20 per cent cover retained in all cases. However, assessments may need to be undertaken for species protected under the EPS regulations.</p>
6.	<p>What do you think of our proposed outline definition of 'mature native woodland'?</p> <p>See question 5 above.</p>
<p>We will expect practitioners to help local users to participate in development of the initial proposals</p>	
7.	<p>Do you agree that local participation in decision making is helpful? What is your preferred option for how we should apply this element?</p>
<p>Public consultation is essential where existing woodland has significance for any group. These may be people living nearby, or they may be particular groups who travel to use the wood eg for recreational purposes. Assessments should be made on a site by site basis as to the need for public consultation and the level required. Consultation should take into account the impacts of operations on local quality of life and public access to sites, as well as on biodiversity, as far as possible. The consultation process should ensure that consultees have access to a full range of information and evidence. Funding and guidance to enable landowners to carry out this element of work would help to ensure high quality consultation is carried out, thus avoiding problems later.</p>	
<p>We will promote mechanisms for prioritising woodland removal at a regional level</p>	
8.	<p>Do you agree that prioritisation at a regional level is appropriate for this policy?</p>
<p>We believe that while decisions may need to be made at a regional level, a national overview is required. The Woodland Trust's view is that restoration of semi-natural open ground habitats should be prioritised in the first instance according to threat to surviving remnants, with particular emphasis on restoration of those planted with non-native conifers. As a secondary consideration, prioritisation should consider the contribution that restoration has to landscape connectivity as a whole. Thirdly, consideration should be given to scale. Restoration is only worthwhile where future management can be sustained. In most cases this will preferably mean year-round low-intensity grazing by cattle, which may only be realistic on sites greater than 100 hectares.</p>	
<p>We will apply a framework for evaluation to projects</p>	
9.	<p>Do you agree with this framework for evaluation? What is your preferred option for how we should apply this element?</p>
<p>For collation at a national level to measure the success of the policy, it will be necessary for all projects to use a similar framework for evaluation. The most effective way to ensure this would be to require use of the framework as a condition of funding. However, we also feel it is essential that good quality guidance is also developed for landowners. The framework will need to include a timescale element otherwise it may be difficult to measure whether or not the action has worked. The question "Was it worth it?" in relation to long term impact would need precise and carefully thought out guidance to enable people to make a proper assessment.</p>	

No	Question.
	<p>Guidance on evaluation could be built into more detailed technical guidance on restoration, which we believe must be produced for landowners undertaking this work. The Woodland Trust's practical guide on PAWS restoration would be an appropriate model for this (Woodland Trust (2005) The Conservation and Restoration of Plantations on Ancient Woodland Sites: A guide for woodland owners and managers www.woodlandtrust.org.uk)</p>
10.	<p>How much and what kind of support do you think we should give to practitioners to help them evaluate their projects using this framework?</p>
	<p>See question 9 above.</p>
<p>To avoid net deforestation in England we will try not to go over a threshold rate of woodland removal due to restoring and expanding open habitats.</p>	
11.	<p>Do you agree with the principle of an England scale threshold rate of woodland removal? What is your preferred mechanism by which such a threshold could be applied to policy?</p>
<p>No, we do not agree with the principle of an England-scale threshold rate as set out in the consultation. The threshold is based on current rates of woodland creation, which are limited by availability of grants as well as a number of other factors such as the relative values of land for agriculture and development as compared with forestry, concerns about 'tying up' land for long periods under tree cover, current concerns about food security etc. The Woodland Trust supports a continued increase in woodland cover, especially native woodland and would be very concerned if there should be a net loss in woodland cover. However, we do not believe that setting a threshold is helpful as this could limit the rate of restoration of open ground habitats, which we see as an essential part of landscape scale action to enable wildlife and people to adapt to climate change.</p> <p>We believe maintaining net woodland cover should be achieved in two ways by:</p> <ul style="list-style-type: none"> - Where appropriate, restoring afforested semi-natural open ground habitats to wood pasture and mosaics of open ground and native woodland. By setting a minimum canopy cover of 20 per cent or more, sites could still be classified as woodland even after restoration. - Action to ensure delivery of HAP targets for native woodland expansion independent of actions to restore semi-natural open-ground habitats 	
12.	<p>Do you consider that the proposed threshold is about right, too high or too low?</p>
	<p>See above</p>
<p>Key variables</p> <p>What is the balance between achieving biodiversity objectives and the need to reduce green house gas emissions?</p>	
13.	<p>Is there a way, in the short term, we can better estimate the contribution to biodiversity objectives from different levels of restoration or expansion of open habitats?</p>
<p>Use of spatial modelling tools such as BEETLE or the 2010 indicator of landscape connectivity.</p>	

No	Question.
14.	Do you agree that management practices to minimise carbon emissions during restoration or expansion of open habitats should be adopted? Do you agree with the outline practices presented? How could we best ensure that such practices are adopted?
	We agree with the techniques suggested, where this does not compromise successful restoration. Low impact silvicultural techniques should be used to minimise soil disturbance, not only to minimise carbon emissions but also to safeguard important elements of the open ground habitat. Pointing managers to the UK Forestry Standard and associated guidelines (currently under revision), and to UKWAS, should help ensure this is done, as well as including this in any specific guidance produced.
15.	Do you agree that it is appropriate to include impact on long-term average carbon store <i>and</i> loss of potential to substitute timber for higher carbon materials and fuel in the calculations on carbon balance?
	If both are to be considered, the latter should be a realistic assessment of the amount of timber on the site that would have been used for these purposes, not just an assessment based on the quantity of timber on the site. However, see question 16 below – we believe arguments based on mitigation of climate change are a distraction, since far more could be achieved by reducing emissions at source, and that the need to restore semi-natural open ground habitats for their biodiversity and climate change adaptation benefits is paramount.
16.	Where do you think the appropriate balance lies between achieving biodiversity objectives and the need to reduce carbon emissions? What processes might help to make this judgement?
	We do not believe these are comparable measures. Restoring open-ground habitats that have been planted with non-native conifers is the best option for increasing the total area of semi-natural open ground habitat in England, and an important measure for increasing their resilience in the face of climate change. There are other avenues for achieving a more favourable carbon balance, including reducing emissions. The figures show that the effect of restoration on the carbon balance is small relative to UK Government emission reduction targets, whereas we believe ambitious action to restore semi-natural open-ground habitats will make a substantial contribution to the development of more resilient landscapes. The need to restore open ground semi-natural habitats should not therefore be compromised by the desire to reduce carbon. However, management techniques should be adopted that minimise carbon emissions without limiting potential for successful restoration.
Should we be managing open habitats to keep them in ‘favourable condition’ or should we adopt a more dynamic approach to land management?	
17.	Outside SSSIs, do you agree that a more dynamic attitude to land management could deliver equivalent or greater gains for open habitats and species than one where success for all sites is based on assessments of condition as applied to SSSIs?
	We broadly agree with a dynamic attitude to land management where this will deliver genuine biodiversity benefits. However, in restoring semi-natural open-ground habitats, the primary purpose of retaining tree cover should be to benefit biodiversity rather than to maintain a timber reserve or for financial reasons. Management planning for restored sites should focus on re-instating semi-natural processes rather than prescribed outcomes.

No	Question.
18.	<p>If so, how might such an approach be developed? Is there scope for modifying the conservation objectives on some SSSIs to incorporate a similar approach? If not, do you consider that the endpoint for all restoration proposals should be judged against favourable condition as defined for SSSI habitats?</p>
	<p>The Woodland Trust's Glen Finglas Estate may provide a useful exemplar. The long-term vision for the estate is to provide a dynamic ecosystem of woodland and open ground managed as a wood-pasture system. Spatially-explicit and species-centred approaches to the management of the site have been avoided. Instead, broad 'limits of acceptable change' have been identified. This approach extends to SSSIs on the estate whilst aspiring to maintain them in favourable condition.</p>
<p>What level of woodland removal due to restoring or expanding open habitats could avoid a significant negative impact on the timber industry?</p>	
19.	<p>Can you provide any information on the likely links between any reduction in timber production and economic activity in the timber sector?</p>
	<p>Wood is a sustainable resource and its use should be encouraged. In particular wood could substitute for many products used in house building and construction. The use of wood produced in the UK reduces the negative environmental impacts of long distance transport of a bulky material. Local wood production has a role in reconnecting people with their woodland environment and can make a valuable contribution to regional and local economies. However, the Woodland Trust believes that wood production should be undertaken in the context of its wider social benefits, not at the expense of or detriment to environmental benefits. The opportunity to restore semi-natural open-ground habitats is far more locationally dependent than wood production and should not, therefore, be compromised by it.</p>
<p>Different approaches to applying policy</p>	
20.	<p>Which of the three approaches by which we make decisions about woodland removal is your preferred option? Can you see any alternative types of approach based either on a combination of these approaches or on new ideas?</p>
	<p>We do not wholly support any of the three options. We would prefer to see policy applied in a way that prioritises restoration of open ground habitats planted with non-native conifers, in the way outlined in previous answers above where sufficient remnants of the original habitat survive to enable restoration. Long-term sustainability of management and the contribution of restoration to landscape connectivity and therefore to climate change adaptation should also be taken into account. While management should be carried out in such a way as to minimise carbon emissions, this should not detract from the need to restore. We do not agree with option 6.3.1 because it fails to recognise the biodiversity and climate change adaptation imperative for restoration. Option 6.3.2 leaves open the option of not restoring sites, but instead using management measures such as ride widening as an alternative. We do not believe this is acceptable. We do not agree with setting national thresholds as in 6.3.3 – the rate of restoration should be guided by the factors above, not by thresholds related to avoiding loss of net woodland cover. Instead, this should be dealt with by independent delivery of woodland HAP targets for expansion.</p>
<p>The role of compensatory planting</p>	
21.	<p>What is the appropriate role of compensatory planting in this policy?</p>
	<p>We do not support the concept of compensatory planting, which we believe could limit restoration of open ground habitats. There is an urgent need for woodland creation but this is independent of the policy on open ground habitat restoration. If HAP targets for woodland expansion were achieved, along with a dynamic approach to restoration and management of open-ground habitats as discussed above,</p>

No	Question.
	<p>there need be no net loss of woodland cover. We believe vigorous efforts should be made to meet these targets independent of the policy of restoration of semi-natural open ground habitats.</p> <p>A programme of restoration should not result in the loss or transfer of money away from existing woodland support mechanisms for woodland management and woodland creation.</p>
<p>Factors to consider when deciding which policy is likely to work best</p>	
22.	<p>Have we developed a reasonable set of questions for informing the decision on which policy is best? Do you wish to suggest any changes to the list of questions?</p>
	<p>No. We are concerned at the way the questions pitch restoration of open ground habitats for biodiversity reasons against issues of carbon balance and net forest cover. We believe that while both these issues are very important, they should not detract from the urgent need to restore semi-natural open ground habitats, particularly those planted with non-native conifers, in order to facilitate adaptation to climate change. This framing of the questions is likely to lead to prejudice in the minds of the public about perceived problems with restoration, by conflating issues that should be viewed entirely independently.</p> <p>We are also concerned that the consultation does not adequately distinguish restoration of semi-natural open ground habitats planted with non-native conifers from those colonised by secondary broadleaved woodland. The urgency for restoration is likely to be greater for the former, and the two may require different approaches, but this is difficult to draw out from the questions the way they have been set out.</p>
<p>Implications for delivery mechanisms</p>	
23.	<p>Have we missed any major implications for delivery mechanisms? Would any be particularly welcome or unwelcome to you?</p>
	<p>Responsibilities for ensuring restoration of semi-natural open ground habitats and their subsequent maintenance in the long term must be clarified.</p> <p>While the Forestry Commission has a major role to play through restoration of sites on its own estate and provision of grant aid, both Natural England and Defra must also play a part in the long-term, providing both funding and regulation. It is not entirely clear at present how this will work, and whether sufficient funding is available.</p>
<p>Other comments</p>	
	<p>We welcome your input on any other aspect of this consultation.</p>
	<p>We would urge careful and accurate communication of this issue in all publicity.</p> <p>Comments and letters received from Woodland Trust members to date show that it is one that provokes strong feelings, and care should be taken over the terms used. For example, 'deforestation' is an emotive term which may actually be misleading where restoration takes a more dynamic approach leading to a wood pasture or native woodland/open ground mosaic habitat.</p>

Please include the "information about you" form with your response.¹

Please send your completed forms to:

¹ See www.forestry.gov.uk/england-openhabitats-consultation for a copy.

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By 17.00hrs, Friday 5 June 2009.